

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

X

Jane Doe,
Plaintiff,

v.

SEAN COMBS, DADDY'S HOUSE
RECORDINGS INC., CE OPCO, LLC d/b/a
COMBS GLOBAL f/k/a COMBS ENTERPRISES
LLC, BAD BOY ENTERTAINMENT
HOLDINGS, INC., BAD BOY PRODUCTIONS
HOLDINGS, INC., BAD BOY BOOKS
HOLDINGS, INC., BAD BOY RECORDS LLC,
BAD BOY ENTERTAINMENT LLC, BAD BOY
PRODUCTIONS LLC, ORGANIZATIONAL
DOES 1-10, INDIVIDUAL DOES 1-10, AND
SHAWN CARTER

24-cv-07975-AT

Defendants.

X

**DECLARATION OF ALEX SPIRO IN SUPPORT OF DEFENDANT SHAWN
CARTER'S OPPOSITION TO PLAINTIFF'S MOTION TO PROCEED
ANONYMOUSLY UNDER PSEUDONYM**

I, Alex Spiro hereby declare under the penalty of perjury, pursuant to 28 U.S.C. 1746 as follows:

1. I am a partner at Quinn Emanuel Urquhart & Sullivan LLP. If called as a witness, I could and would testify competently to the information contained herein. I make this Declaration in support of Defendant Shawn Carter's Opposition to Plaintiff's Motion to Proceed Anonymously Under Pseudonym.
2. Attached hereto as **Exhibit 1**, is a true and correct copy of Defendant's Motion to Deny Plaintiff's Request to Proceed Anonymously (Dkt. No. 38).
3. Attached hereto as **Exhibit 2**, is a true and correct copy of the 7:27 PM EST, NBC News report on an interview that its reporters conducted with the anonymous Plaintiff in this case.

I declare under the penalty of perjury that the foregoing statements are true and correct. Executed in New York, New York on the 23rd day of December 2024.

DATED: December 23, 2024

/s/ *Alex Spiro*

Alex Spiro